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Date: 5/28/2019 10:02:04 AM

Subject: FW: PDI Data Evaluation Briefing Memos and Summary Talking Points -- deliberative email and attachments

Attachments: PH_PDI-Summ-Talk-Pts_Final-Draft-v3-deliberative.docx

PH_PDI-Briefing-Memos_deliberative.pdf

Hi Sheryl, please see the attached (word) file summarizing all of the memos to date to forward on along with the deeper background (pdf file rollout). In summary, our review indicates that the data supports moving forward with ROD implementation, ie. the site is not cleaning itself up absent active cleanup.

Thank you.

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Attached are the summary talking points and compiled PDF of the 9 PDI data evaluation briefing memos. Included below are highlights of our findings:

- * The SMAs received on average less than 1 foot of new sediment since 2004.
- * Natural recovery is occurring in the Site predominantly in the MNR areas and not to the same extent in the SMAs
- * Concentrations of the focused COCs in surface sediment have not changed substantially in the SMAs since the RI/FS.
- * The RAL concentrations are still appropriate thresholds for determining where dredging and/or capping will occur.
- * Dioxins/furans are collocated with the other focused COCs in both surface and subsurface sediments.
- * Surface sediment and fish tissue focused COC concentrations in the Superfund Site are not equivalent with (and therefore statistically higher than) those in the upstream background area.
- * The 2018 PDI focused only on in-water sampling and did not review the work or data collected under DEQ's upland source control program.
- * Natural recovery is occurring in smallmouth bass at rates less than 10% per year. Active remediation will increase this rate to greater than 20% and possibly as high as 70-90% in some areas of the Site.
- * The home ranges of smallmouth bass are consistent with the previous Oregon Department of Fish and Wildlife study conducted from 2000 to 2003. Therefore, a new food web model is not required.
- * The 2- to 3-river mile segments proposed by the Pre-RD Group have not been substantiated by the new data.
- * Background porewater cleanup level exceedances of arsenic and manganese do not supplant the regulatory- and risk-based values without further study.

Additionally, the Supplemental Data Figures for the different briefing memos are available via SFT with the following link and credentials:

* (b) (6)

* Use the following password when prompted: (b) (6)

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